

K&L GATES

January 13, 2025

By ECF

The Honorable Gregory H. Woods
United States District Court
for the Southern District of New York
Daniel Patrick Moynihan United States
Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: USA v. Kostin, et al., Case No. 24-cr-00091-GHW

Dear Judge Woods:

On behalf of Defendant Vadim Wolfson, I write to request a modification of Mr. Wolfson's conditions of release to permit him to periodically travel to the Eastern District of California for business purposes. Mr. Wolfson currently resides in the Central District of California.

Pretrial Services consents to this modification provided that Mr. Wolfson gives advance notice of travel and copies of his itinerary. The prosecution team also consents, provided that Mr. Wolfson, in addition to complying with the above request from Pretrial Services, agrees to seek Court approval for any trips that will last longer than five days. Mr. Wolfson agrees to these proposed conditions.

Respectfully submitted,

/s/ David Rybicki
David Rybicki

Counsel for Vadim Wolfson